Verizon New England Inc.
d/b/a Verizon New Hampshire

State of New Hampshire

Docket # DT 02-110

Respondent: Dr. James H. Vander Weide
Title: Research Professor of Finance
and Economics

Respondent: Alan Cort
Title: Director – Regulatory

REQUEST: Freedom Ring Communications, L.L.C. d/b/a BayRing
Communications and Conversent Communications of New
Hampshire, LLC, Set #1

DATED: September 13, 2002

ITEM: BR/Conv. 1-13 Please refer to Dr. Vander Weide's Direct Testimony at page
39, lines 5-6. Dr. Vander Weide begins his discussion regarding
the risks implied by actual competitive market conditions.
What is Verizon's loop distribution fill factor and how was it
derived? Please explain and provide the reduction made to the
fill factor to account for loops lost to competition.

REPLY: Verizon NH objects to this request on the grounds that it is not
reasonably calculated to lead to admissible evidence. This
proceeding is concerned with the cost of capital, not other
elements of UNE cost studies such as the loop distribution fill
factor, and Verizon NH is not presenting evidence on such
other elements. Furthermore, Dr. Vander Weide's discussion
beginning at page 39 on the risks implied by actual competitive
market conditions does not refer to Verizon NH's loop
distribution fill factor.

Without waiving this objection, Verizon NH provides the
following response.

The Loop distribution fill factor in New Hampshire is
calculated in terms of a percentage from the product of
Working OUT Pairs over Available OUT Pairs.
472255/1268969=37.2%

This fill factor is based on a snapshot as of a certain date and would be reflective of any lost loops to competition.   In constructing forward looking TELRIC cost studies for the Network, a factor would have to be included to "foresee" expected competitive loop losses, which would apply to current Network distribution fill factors.

VZ #13